

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF MISSOURI (ST. LOUIS)

In re:)	Honorable Charles E. Rendlen, III
)	Chapter 7
Lanita Edwards)	Case No. 10-50931-705
)	
Debtor)	Objection to Debtor's Motion
)	to Redeem
Trimus Receivables, LLC,)	
)	Hearing Date: February 16, 2011
Movant)	Hearing Time: 9:30 a.m.
)	
)	Michael P. Gaughan, Esq.
)	South & Associates, P.C.
)	6363 College Blvd. Ste. 100
)	Overland Park, KS 66211
)	913-663-7600

OBJECTION TO DEBTOR'S MOTION TO REDEEM

COMES NOW Movant Trimus Receivables, LLC, ("Movant") and for its Objection to Debtor's Motion to Redeem, respectfully states to the Court as follows:

1. Lanita Edwards, Debtor is indebted to Trimus Receivables, LLC in the sum of \$11,705.18, plus interest. The Debtor's debt is secured by a first, prior and duly perfected security interest in, to and against a 2006 Pontiac Grand Prix, VIN: 2G2WP552761234179, (the "Collateral").

2. Although the Debtor represents the Collateral to have a current market value of only \$5,370.00, Trimus Receivables states that proper valuation for redemption in this case is the NADA retail value of \$9,275.00. A copy of the relevant NADA valuation is attached hereto as Exhibit A.

3. Trimus Receivables has not consented to accept a redemption in the amount of \$5,370.00 and objects to same.

WHEREFORE, Movant Trimus Receivables respectfully requests the Court to enter among others the following orders:

- (a) An Order overruling the Debtor's Motion to Redeem;
- (b) Or, in the alternative, An Order directing Debtor to pay at least \$9,275 in order to redeem said vehicle;
- (c) Or, in the alternative, an Order directing the debtor to make said vehicle available for inspection and appraisal in order to independently ascertain its present value.
- (d) An order granting such other and further relief as the Court deems just.

South & Associates, P.C.

/s/ Michael P. Gaughan
Michael P. Gaughan, EDMO #31121
Daniel A. West, EDMO #98415
6363 College Blvd, Suite 100
Overland Park, KS 66211
Pho: (913) 663-7600
Fax: (913) 663-7899
ATTORNEYS FOR MOVANT
TRIMUS RECEIVABLE, LLC

CERTIFICATE OF MAILING

The undersigned certifies that the foregoing document was served electronically to those parties who have entered an appearance in the court's Electronic Court Filing (ECF) System and conventionally, via first-class mail, postage prepaid, to those parties below who have requested notice but are not participating in the ECF System, on the date entered on the court's docket.

Michael P. Gaughan
Attorney of Record

Lanita Edwards
6831 Roberts Avenue
Saint Louis, MO 63130
DEBTOR

Douglas M. Heagler
ATTORNEY FOR DEBTOR

E. Rebecca Case
TRUSTEE